

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

BUZZ PHOTOS, INC., *et al.*

*Plaintiffs,*

v.

THE PEOPLE’S REPUBLIC OF CHINA, *et al.*

*Defendants.*

Civil Action No. 3:20-cv-00656-K

**PLAINTIFFS’ STATUS REPORT**

Plaintiffs Buzz Photos Inc. (“Buzz Photos”), Freedom Watch, Inc. (“Freedom Watch”), Larry Klayman (“Klayman”) and Members of the Class and Subclass (“Members”) hereby respectfully submit this response to the Court’s Order of December 30, 2020 [Dkt. #40]:

Plaintiffs are in the process of effectuating service of process through the U.S. Department of State. In this regard, this type of service of process is extremely costly and also takes an inordinate amount of time, particularly given poor relations between the United States and Defendant the People’s Republic of China.

Plaintiffs anticipate that it will take at least six (6) months to complete service. Plaintiffs propose that they provide this honorable Court a status report every sixty (60) days. Plaintiffs respectfully request that this case not be administratively closed since no prejudice will occur to the Defendants, particularly given their lack of respect towards this Court’s authority and processes.

Dated: January 29, 2021

Respectfully submitted,

/s/ Larry Klayman

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